## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

GUSTAVO ROMANELLO and ACELA	)
ROMANELLO,	)
Plaintiffs,	) Case No. 5:12 CV 371-FL
	)
v.	)
	) DEFENDANT'S PROPOSED
BANKUNITED, INC., TRUSTEE SERVICES	) DEADLINE FOR FILING
OF CAROLINA, LLC, BROCK & SCOTT,	) MOTIONS TO DISMISS
PLLC, RAGSDALE LIGGETT, PLLC and	)
ASHLEY H. CAMPBELL,	)
	)
Defendants.	_ )

Ashley H. Campbell, by and through her undersigned counsel, hereby responds to the Court's June 19, 2013 directive regarding the timing of the filing of additional motions to dismiss and show unto the Court as follows:

- On June 19, 2013 the Court directed the Parties to submit within 14 days proposed deadlines for filing additional motions to dismiss directed to the Plaintiffs' Second Amended Complaint.
- 2. The undersigned has conferred with counsel for the remaining Defendants Bank United, Inc., Trustee Services of Carolina, LLC and Brock & Scott, PLLC regarding this issue and all of the Defendants respectfully request the Court to allow them until August 9, 2013 to file additional motions to dismiss directed to Plaintiffs Second Amended Complaint and all discovery be stayed until such time as a decision has been made on the file motion.

This the 1<sup>st</sup> day of July, 2013.

## MANNING FULTON & SKINNER, P.A.

By: /s/ J. Whitfield Gibson

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Counsel for Ragsdale Liggett, PLLC and

Ashley H. Campbell

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **DEFENDANT'S PROPOSED DEADLINE FOR FILING MOTIONS TO DISMISS** was filed with the Clerk of Court using the CM/ECF System which will send notification of such filing to the following

Gustavo Romanello Acella Romanello 5445 Thunderidge Drive Raleigh, NC 27610 Pro Se Plaintiffs

Sean Partrick Yates McLamb & Weyher, L.L.P. 421 Fayetteville Street, Suite 1200 Raleigh, NC 27601 Counsel for BankUnited Marc Asbill Brock and Scott, PLLC 5121 Parkway Plaza Blvd., Suite 300 Charlotte, NC 28217-1965 Telephone:704-643-0290 Fax:704-369-0760

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Counsel for Trustee Services of the Carolinas, LLC

This the 1<sup>st</sup> day of July, 2013.

## MANNING FULTON & SKINNER, P.A.

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